

April 6, 2000

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APR 11 2000

Mr. Allen Fiksdal, Manager  
EFSEC  
P.O. Box 43172  
Olympia, WA 98504-3172

Dear Mr. Fiksdal:

ENERGY FACILITY SITE  
EVALUATION COUNCIL

Following are my comments on the DEIS for Sumas 2:

## Chapter 2, Transmission Lines

Two alternate 115 kv transmission lines, one to the BPA Bellingham substation and the other to the BPA Custer substation: will the S2GF plant be built without knowing where the power is going to be sold or distributed? If not, then a more definitive description of the routes and specific mitigation measures need to be addressed. For example, the two routes described in the DEIS have many farm buildings and homes that are steel-clad with steel roofs including an immigrant camp for temporary agriculture workers. Are there plans to ground these buildings?

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It also appears that many trees will have to be removed, including several very old (probably 100 years) cottonwoods at the proposed Nooksack river crossing. All those trees that must be removed need to be so designated, and the property owners notified and compensated.

2

If BC Hydro accepts the power for distribution on to their grid, what is their cost for additional switching equipment and power distribution, etc., compared to BPA's cost at their respective substations? Whatcom County needs to know in advance of the construction whether or not the power will be distributed from the County in order to mitigate the effects of the two major routes.

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## Chapter 3, Water

Recently several wells in the vicinity (all drawing water from the Sumas-Abbotsford aquifer) were tested for harmful substances, including certain pesticides and nitrates. More than half had nitrate levels above what is considered a safe level. The DEIS recommends no mitigation although the draw-down caused by S2GF will only increase the concentration of these harmful substances. Will S2GF provide free bottled water to homes in the area if the nitrate levels are increased by the draw-down?

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The unallocated portion of Sumas' water rights is 1,171 gpm (daily rate), of this amount S2GF will use 849 gpm, essentially all of Sumas' water. Without an additional source of water, the town of Sumas can't provide water to any new businesses, industries or even homes. In a worst case scenario, i.e., below average precipitation, where re-charge is well below the amount used, the entire surrounding area including Abbotsford, B.C., would be seriously affected. Will S2GF cease its operations in such an event? This needs to be addressed in the EIS.

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#### Chapter 2, Natural Gas Pipeline

The "regular natural gas leak surveys" need to be rigorously defined. For example, how often, what equipment, etc. Surveys once a year are not adequate. Weekly surveys should be proposed.

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#### Chapter 2, 2,500,000 gallon oil storage tank

What material would be used to make the basin "impervious" as well as the "impervious" berm?

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#### Chapter 3, Air Quality

The DEIS states that "no significant adverse air quality impacts would occur" with the increased emissions. Yet S2GF will produce each day 336 pounds of particulate matter (PM10), 2,232 pounds of SO2, and 2,232 pounds of NOx, in addition to other organics and heavy metals. Also, S2GF will produce nearly 7,000 tons of CO2 per day. To say that these amounts of effluents will not have any adverse effects is disingenuous! Admittedly, the amounts of toxins emitted may be at or below legal State and Federal regulations, but the total amounts - 2-3 tons per day, excluding CO2, will be added to the atmosphere, and the results will not be benign. The acid fallout from SO2 and NOx (and to a lesser extent, CO2) may very well be devastating to the surrounding agriculture. The modeling procedures used for air quality analysis produce wonderful tables that only trained industrial hygienists can understand, but they obfuscate real world conditions.

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#### Chapter 3, Noise

The DEIS does not reflect the true effect of noise emitted from a combustion turbine plant. The dBA levels will be close to (or even exceed) allowed environmental noise levels, and the plant siting should be denied on this basis alone. However, I have experienced the annoying whine from a 260mw plant similar to the one proposed. The

whine was well within the dBA levels allowed, but it is a penetrating sound that passes through walls and can be heard for miles! It is constant, 24 hours per day, 365 days per year. The only relief is to move far, far away. I do not believe technology can mitigate or reduce this noise to an acceptable level. Sound barriers, walls, trees, etc., do not stop it. People in homes up to five miles away will hear this whine. Section 3.3.7 states: "With proper design and operation of the proposed facility, no significant adverse impacts are expected." This statement is false.

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#### Section 3.4, Wetlands and Vegetation

Wetlands evolve over centuries. They are located where they are because of very specific hydrology, topography, geography, and weather functions. To mitigate the filling (destruction) of an existing wetland by "creating" a new wetland is presumptuous. Nearly all "created" wetlands fail for a variety of reasons. The main reason is that nature never intended them to be where mankind decides they should be. With constant maintenance, a "created" wetland may look good. However, it will not be a suitable habitat for the thousands of plant, animal and insect species that are found in a naturally evolved wetland. Basically, there is no mitigation for a destroyed wetland. The proposed route of power lines across the Nooksack River would require destruction of cottonwood trees which are now prime bald eagle habitat. Those lines should be designed to go underground at that location.

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#### Section 3.5, Fish and Wildlife

The section concentrates on threatened/endangered species, but it is woefully inadequate on the more common species that will be impacted. Appendix E fails to mention many of the species that will be destroyed by the construction, particularly the small mammals including voles, shrews, moles, and gophers. The predators that rely on these small mammals will be impacted heavily, including northern harriers, red tailed hawks, rough legged hawks, barn owls (not even mentioned in the DEIS, but present), great horned owls, kestrels, coopers hawks, and sharp shinned hawks. All the above are in the vicinity of the plant site. The list of birds that would be impacted is pitifully inadequate. There are more than 100 species that inhabit the Sumas area.

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In addition, no mention is made of the impact of the 3 tons of effluent discharged daily on the bird and mammalian species. This effluent will have a profound effect on wildlife species in the area.

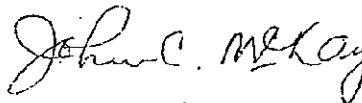
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I would like to request additional time to evaluate and comment on Visual, Cultural and Socioeconomics. Please extend the public comment period. <sup>\*</sup>

Thank you.

Yours truly,

\* Thanks for the  
extension.  
J.



John C. McKay

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